

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

LEAR CORPORATION,

Plaintiff,

v.

**NHK SEATING OF AMERICA,
INC.**

Defendants.

Case No. 2:13-cv-12937-LJM-RSW

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR LEAVE TO
FILE UNDER SEAL**

Plaintiff Lear Corporation (“Lear”) respectfully submits this unopposed Motion for Leave to File Under Seal contents of Exhibits 52, 53, and 54 submitted in connection with Lear Corporation’s Reply In Support Of Motion To Consolidate Cases And Join Defendants NHK International Corporation And NHK Spring Co. Ltd.

The authority for sealing such documents is pursuant to Local Rule 5.3, and the Stipulated Protective Order (Dkt. #27) entered in the present case.

Lear references information from documents produced by NHK Seating of America, Inc. (“NHK”) during discovery, which pursuant to the Protective Order, have been designated as “Highly Confidential – Attorney’s Eyes Only.” Lear believes this information designated as confidential is necessary to support Lear’s Reply in Support of Consolidation. Therefore, Lear requests the following documents to be filed under seal:

Reply In Support Of Consolidation	
Document	Contents
Exhibit 52	Excerpts of Deposition Transcript of NHK Seating Finance Manager Steven Thomas NHK designated the document “Highly Confidential – Attorney’s Eyes Only”
Exhibit 53	2012 NHK Seating Financial Statement (NSA_3943) NHK designated the document “Highly Confidential – Attorney’s Eyes Only”
Exhibit 54	2013 NHK Seating Financial Statement (NSA_2562) NHK designated the document “Highly Confidential – Attorney’s Eyes Only”

Lear is not asking the Court to seal any portion of Lear’s Reply in Support of Consolidation. Instead, Lear is requesting the Court to seal the above-identified exhibits because NHK has designated the documents as containing or referring to “trade secrets or other confidential research, development, business or financial

information, or other confidential commercial information, and that, if disclosed to a business competitor, would tend to damage the party's competitive position.” (Protective Order, Dkt. #27 at 1.)

Pursuant to Local Rule 7.1(a), Lear has conferred with counsel for NHK, and NHK does not oppose the present motion. A proposed stipulated order consistent with the relief requested in this motion is also being submitted for approval.

Respectfully submitted,

BROOKS KUSHMAN P.C.

Dated: July 11, 2018

/s/ Todd W. Dishman
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CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on July 11, 2018, I electronically filed the foregoing **UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL** with the Clerk of the Court for the Eastern District of Michigan using the ECF System. I submitted copies of all sealed documents via electronic means to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing:

I further certify that I have mailed by United States Postal Service the paper to the following non-participants in the ECF System: None.

Respectfully submitted,

BROOKS KUSHMAN P.C.

/s/ Todd W. Dishman

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